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October 4, 2022

VIA ECF

Honorable Jennifer Rochon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Fleur Sohtz v. Noogata Technologies, Inc. and Assaf Egozi*
Docket #: 22-CV-03608 (KPF)

Dear Judge Rochon:

Our office represents the Plaintiff Fleur Sohtz in the matter referenced above. I write jointly with counsel for Defendants in accordance with Your Honor's Order dated September 20, 2022 requesting a letter updating the Court on the status of the case. The parties respond as follows:

1. Name of counsel and current contact information, if different from the information currently reflected on the docket

Response: The information on the docket is up-to-date and accurate

2. A brief statement of the nature of the case and/or the principal defenses thereto:

Response: The nature of the case is disability discrimination, refusal to engage in a cooperative dialogue, failure to provide a reasonable accommodation and retaliation under the New York City Human Rights Law. Defendants deny any discrimination or retaliation against Plaintiff, and submit that they engaged meaningfully in a cooperative dialogue.

3. A brief explanation of why jurisdiction and venue lie in this Court.

Response: Jurisdiction is based on diversity pursuant to Title 28, United States Code §1332. Plaintiff is a resident of New York City. Defendant Noogata Technologies, Inc. is a Delaware corporation with headquarters and principal place of business in Tel Aviv, Israel. Defendant Asaf Egozi is a resident of Israel.

4. A statement of all existing deadlines, due dates, and/or cut-off dates.

Response: None.



5. **A statement of any previously scheduled conferences dates with the Court that have not yet occurred and the matters that were to be discussed**

Response: None

6. **A brief description of outstanding motions, including the date of the motion and the nature of the relief sought.**

Response: None

7. **A statement and description of any pending appeals.**

Response: None

8. **A detailed statement of all discovery undertaken to date, including how many depositions each party has taken and what, if any, discovery remains that is essential for the parties to engage in meaningful settlement negotiations**

Response: A case management plan has not been entered and discovery has not yet commenced as the parties are scheduled to mediate this case on October 19, 2022.

9. **A brief description of the status of prior settlement discussions, without disclosing exact offers and demands**

Response: The parties engaged in settlement negotiations pre-suit. The matter did not resolve at that time and this litigation commenced.

10. **A statement of whether the parties have discussed the use of alternate dispute resolution mechanisms and indicating whether the parties believe that (a) a settlement conference before a Magistrate Judge; (b) participation in the District's Mediation Program; and/or (c) retention of a privately retained mediator would be appropriate and, if so, when in the case (e.g., within the next 60 days, after the deposition of plaintiff is completed, after the close of fact discovery, etc.) the use of such a mechanism would be appropriate.**

Response: The parties are scheduled to mediate this case on October 19, 2022

11. **An estimate of the length of trial.**

Response: 3-5 days

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12. Any other information that the parties believe may assist the Court in advancing the case to settlement or trial, including, but not limited to, a description of any dispositive or novel issue raised by the case.

Response: None at this time.

Respectfully yours,



DAVIDA S. PERRY

DSP/arp

cc: Vincent Bauer, Esq. - Via ECF